

LAW OFFICES OF JOHN A. HAUSER
By: LAURIE J. ELZA, State Bar No.: 284903
One Pointe Drive, 6th Floor,
Brea, CA 92821
Phone: (714) 571-0407 / Fax: (877) 369-5799
Direct Line: (714) 371-2311
E-Mail: laurie.elza@thehartford.com
Mailing Address: P.O. Box 2282, Brea, CA 92822-2282

LEWIS BRISBOIS BISGAARD & SMITH, LLP
By: ANDREW C. HUBERT, State Bar No.: 117887
By: DANA A. FOX, State Bar No.: 119761
633 W. 5th Street, Ste. 4000
Los Angeles, CA 90071
Phone: (213) 580-6337 / F: (213) 250-7900
E-Mail: andrew.hubert@lewisbrisbois.com; dana.fox@lewisbrisbois.com

Attorneys for Defendant, PA SOLUTIONS, INC.

UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

CAMERON DYESS, an individual,

Plaintiff,

vs.

ESTATE OF JAJUAN LEE MORTON,
Deceased; DONYELL SHAJUAN
HANKINS as Personal Representative of
the ESTATE OF JAJUAN LEE MORTON,
Deceased; PA SOLUTIONS, INC., a
Michigan Corporation; and DOES 1 through
20, inclusive,

Defendants.

CASE NO. 4:20-cv-00909-HSG
*[Assigned for All Purposes to the Honorable
Haywood S. Gilliam, Jr.; Courtroom 2]*

**STIPULATED REQUEST FOR ORDER
EXTENDING DEADLINE TO
MEDIATE AND USE OF PRIVATE
MEDIATOR & ORDER THEREON
(as modified)**

Action Filed: November 22, 2019
Trial Date: November 8, 2021

///

Plaintiff Cameron Dyess and Defendants Estate of Jajuan Lee Morton and PA Solutions, Inc. (collectively “the Parties”), submit this stipulation to extend the deadline to mediate this matter, subject to the Court’s approval, as follows:

On May 15, 2020, the Court issued an Order Selecting ADR Process (Document 29), as follows:

EVENT	DATE
Mediation Deadline	February 1, 2021

The Parties agree and stipulate that the discovery necessary to prepare this matter for mediation was not able to be completed by the above deadline. The Parties further agree and stipulate that the delay in discovery is due to events beyond the parties’ control and which, despite their best efforts, cannot be rectified. The delays are due to the COVID pandemic and the multi-state locations of the Parties and medical providers. These delays include the inability to obtain complete medical records and billing, which adversely impacts the Parties’ ability to retain experts and to schedule depositions of medical providers, as well as ongoing document discovery between the parties, which will necessitate depositions of party representatives and employee witnesses which are currently scheduled for March 2021.

The Parties agree and stipulate that an extension of the deadline to mediate is needed to permit the Parties to complete the discovery necessary for mediation.

The Parties further agree and stipulate to the use of a private mediator and removal from the court-sponsored mediation.

The Parties agree and stipulate that this stipulation is made in good faith in the interests of judicial economy and efficiency of resources of the Court and the Parties and is not for the purposes of delay.

IT IS STIPULATED AND AGREED, by and between the parties and their undersigned counsel of record, that the deadline to mediate be moved to August 1, 2021, and that this matter be removed from the court-sponsored mediation program and referred to private mediation.

DATED: February 26, 2021

ERSKINE LAW, PC

BY: /s/ Jonathan M. Shugart
JONATHAN M. SHUGART, ESQ.
Attorneys for Plaintiff, CAMERON DYESS

DATED: February 26, 2021

LAW OFFICES OF JOHN A. HAUSER

BY: /s/ Laurie J. Elza
LAURIE J. ELZA, ESQ.
Attorneys for Defendant, PA SOLUTIONS, INC.

DATED: February 26, 2021

LEWIS BRISBOIS BISGAARD & SMITH, LLP

BY: /s/ Andrew C. Hubert
ANDREW C. HUBERT, ESQ.
Co-Counsel for Defendant, PA SOLUTIONS, INC.

DATED: February 26, 2021

KNUDTSON & ASSOCIATES, PC

BY: /s/ Gigi Knudtson
GIGI KNUDTSON, ESQ.
Attorneys for Defendant, ESTATE OF JAJUAN
LEE MORTON

ORDER

IT IS SO ORDERED that in light of this stipulation, the Court sets aside its previous order referring the case to court-connected mediation (docket no. 29). The parties are directed to complete private mediation by August 1, 2021.

DATED: 3/1/2021


HON. HAYWOOD S. GILLIAM, JR. UNITED
STATES DISTRICT COURT JUDGE